

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

JAMES GRADY GATHINGS, a/k/a  
JAMIE GATHINGS, in his Individual  
and official capacity Richmond County  
Commissioner,

Plaintiff,

v.

RICHMOND COUNTY, RICHMOND  
COUNTY BOARD OF  
COMMISSIONERS; RICK W.  
WATKINS, in his official capacity;  
ANDY GROOMS, in his official  
capacity; JEFF SMART, in his official  
capacity; JUSTIN DAWKINS, in his  
official capacity;  
JASON GAINES, in his official  
capacity; and ROBIN ROBERTS, in her  
official capacity,

Defendants.

Case No. 1:25-cv-434

CONSENT MOTION FOR  
EXTENSION OF TIME

NOW COMES Plaintiff James Grady Gathings, a/k/a Jamie Gathings (“Mr. Gathings”), through the undersigned counsel, pursuant Local Rule 6.1(a) and Federal Rule of Civil Procedure 6(b), and with Defendant Richmond County’s consent, and moves the Court for a two-week extension to his deadline to file his Reply Brief in Further Support of Motion to Remand (“Reply Brief”). In support of this motion, Mr. Gathings shows the Court as follows:

1. Mr. Gathings filed his Motion to Remand (ECF No. 11) and Brief in Support of Motion to Remand (ECF No. 12) on June 9, 2025. Defendant Richmond County timely filed its Response to Plaintiff James Grady Gathings’s Motion to Remand (ECF No. 17) on June 30, 2025.

2. Pursuant to Local Rule 7.2(h), Mr. Gathings has fourteen days from the date Richmond County filed its response to file a reply. As a result, Mr. Gathings's Reply Brief is currently due to be filed on or before July 14, 2025.

3. The above-captioned parties have reached an agreement in principle to settle this matter.

4. A two-week extension of time to Mr. Gathings's deadline to file his Reply Brief should provide the parties sufficient time to finalize and execute the paperwork necessary to formalize their settlement. Mr. Gathings expects to dismiss this matter shortly after the settlement paperwork is finalized and executed.

5. Mr. Gathings's counsel has conferred with Richmond County's counsel, and Richmond County consents to the requested extension.

THEREFORE, for the reasons expressed above, Mr. Gathings requests that the Court enter an order extending his deadline to file his Reply Brief by two weeks, through and including July 28, 2025.

Dated: July 10, 2025

/s/ Lee D. Denton  
Lee D. Denton (N.C. Bar No. 47695)  
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*Attorney for Plaintiff James Grady Gathings,  
a/k/a Jamie Gathings*

### **CERTIFICATE OF SERVICE**

I hereby certify that on the below-listed date, I electronically filed the foregoing Consent Motion for Extension of Time with the Clerk of Court using the CM/ECF system, which will send notification of such filing(s) to registered users of record.

Dated: July 10, 2025.

/s/ Lee D. Denton  
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